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7 ESTATE OF DEREK VALENTINE,
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21 ESTATE OF DEREK VALENTINE, ARACELI
22 SANCHEZ, L.V., C.V., M.V., RUTH RAMIREZ,
and ALBERT VALENTINE,

23 Plaintiffs,

24 vs.

25 COUNTY OF MERCED, MERCED COUNTY
26 SHERIFF'S OFFICE, VERNON WARNKE,
CALIFORNIA FORENSIC MEDICAL GROUP
27 dba WELLPATH, and DOE 1 to 20,

28 Defendants.

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CALIFORNIA FORENSIC MEDICAL GROUP
dba WELLPATH

Case No. 1:23-cv-01697-JLT-SAB

**STIPULATION FOR FILING
FIRST AMENDED COMPLAINT
AND RESPONSIVE PLEADINGS**

The Estate of Derek Valentine, Araceli Sanchez, L.V., C.V., M.V., Ruth Ramirez, and Albert Valentine (collectively, “Plaintiffs”); the County of Merced, Merced County Sheriff’s Office, and Vernon Warnke (collectively, “County Defendants”); and California Forensic Medical Group dba Wellpath (“Wellpath”) submit the following stipulation.

WHEREAS, Plaintiffs seek to file a First Amended Complaint pursuant to Federal Rule of Civil Procedure 15(a)(2);

WHEREAS, County Defendants and Wellpath's responsive pleadings to an amended pleading would be due within 14 days after filing of the amended pleading pursuant to Federal Rule of Civil Procedure 15(a)(3);

WHEREFORE, Plaintiffs, County Defendants, and Wellpath's counsel have met-and-conferred and reached an agreement as to the filing of an amended pleading and responsive pleadings; and

Now, THEREFORE, Plaintiffs, County Defendants, and Wellpath STIPULATE that:

1. Plaintiffs shall have leave to file a First Amended Complaint pursuant to Federal Rule of Civil Procedure 15(a)(2); and

2. County Defendants and Wellpath shall have a 28-day extension of time to file responsive pleadings to the First Amended Complaint pursuant to Local Rule 144(a), in addition to the 14-day deadline pursuant to Federal Rule of Civil Procedure 15(a)(3).

IT IS SO STIPULATED.

Dated: June 24, 2024

Respectfully Submitted,
LAW OFFICE OF MARK E. MERIN

/s/ Mark E. Merin

By:

Mark E. Merin
Paul H. Masuhara

Attorneys for Plaintiffs
ESTATE OF DEREK VALENTINE,
ARACELI SANCHEZ, L.V., C.V., M.V.,
RUTH RAMIREZ, and ALBERT VALENTINE

1 Dated: June 25, 2024

Respectfully Submitted,

P O R T E R | S C O T T

3 */s/ Matthew W. Gross*
4 (as authorized on June 25, 2024)

5 By: _____

6 Carl L. Fessenden
7 Matthew W. Gross

8

9 Attorneys for Defendants
10 COUNTY OF MERCED, MERCED COUNTY
11 SHERIFF'S OFFICE, and VERNON WARNEKE

12 Dated: June 24, 2024

13 Respectfully Submitted,
14 GORDON REES SCULLY MANSUKHANI, LLP

15 */s/ Allison Becker*
16 (as authorized on June 24, 2024)

17 By: _____

18 Lindsey M. Romano
19 Allison Becker

20 Attorneys for Defendant
21 CALIFORNIA FORENSIC MEDICAL GROUP
22 dba WELLPATH